

## **Plastrans Code of Conduct**

### **Plastrans' Values Turning Visions into Reality.**

Since the founding of Plastrans in 1991 the former name Plastrans Petrochemicals, as well as, the actual name Plastrans Technologies stands for embracing the idea of diversity and the unique combination of talents in our team. Because of our diverse team we made English the first working language, which is exceptional in Austrian SMEs. Therefore, we see and live diversity every day. We are not differentiating between countries of origin, social background, gender, cultural background or sexual orientation. Instead, we understand diversity strengthens us on every level in our multinational business activities. Filling the term “diversity” with life every day enables us to connect closer to our customers and to better understand how we serve them best.

This is the basis that enables us to realize our vision.

#### **To be a leading supplier of biopolymer materials, serving the polymer converting industry.**

As a matter of principle, we are committed to the highest ethical standards and all applicable laws in organizing the work within our team and with our business partners. Ensuring the health of our team members and managing our workplace responsibly and respectfully is obvious to us.

### **Corporate Social Responsibility (CSR)**

We clearly understand our role in society, and we take our responsibility to support and to improve local, regional and global communities. For doing so we strictly rely on the UN Sustainable Development Goals in our social and business activities. This is also strongly reflected in our corporate vision that supports and facilitates the use of sustainable materials for the better. With our business activities in biopolymers and our business and work ethics, we work towards a sustainable, equal and open society without room for discrimination, harassment, bribery and corruption. Additional information can be found on [Social Impact - Promotion of projects \(plastrans.com\)](https://www.plastrans.com/social-impact).

### **Our Team's Work Ethics**

With all our business activities we strive to continuously serve the UN sustainable development goals. We set priorities to these goals in our business operations and lay the basis for fair and responsible business relations. With strictly respecting principles of equality, fair business practices, environmental and social sustainability, and not tolerating discrimination, we show our commitment every day to ourselves and our business partners.

A positive working environment is crucial for the success of our team. At Plastrans we place a strong emphasis on positive and mutual respectful communication across and within the levels of our organization. We do not see any justification for insults, harassment or discrimination, particularly not

because of gender, age, disabilities, pregnancy, color of skin, origin and cultural or social background. We do not tolerate any kind of insult, harassment or discrimination at all.

### **Equal Employment Opportunities**

We care for our team by giving opportunities for professional and personal development and actively support young talents in their first steps into industry with a special young talent program. Additionally, we constantly strive to leverage potential within our team and support with a leadership program.

We follow a policy of equal employment opportunities for team members and candidates alike, which is moreover based on mutual respect and fair labor practices. It is obvious to us that we do not accept any kind of child labor.

### **Health and Safety**

We provide a workspace that is not only ensuring health and safety, but also improving it. In our offices we support our team with a regional and balanced diet twice a week, as well as fruits and vitamins every day. We are concerned about ergonomic working conditions, rules for safe business trips and finally also provide appropriate get-together spaces for maintaining our team's mental hygiene. Moreover, we provide access to extensive fitness and body health opportunities that peak in our offer of regular group fitness events to motivate and to combine mental and physical health with building team spirit.

Particularly, the pressing environmental and climate crisis is of special importance to us, which is reflected in the increasing range of recycled and bio-based materials in our portfolio.

## **Business Conduct**

Professionalism is one cornerstone of our daily business. Under the term "professionalism" we not only summarize managerial professionalism, reflected in our ISO 9001 certification, but also environmental professionalism, which is reflected according to our ISO 14001. We focus our business on long-term partnerships, which are always based on mutual respect. We are committed to fair practices placing our customers at the center of our activities. Additionally, we are working together with our supply partners to achieve the best results possible for our customers, for our supply partners and for Plastrans Technologies alike. Compliance in our supply chain and sales activities is a key element in our business. We strictly adhere to EU law and to the trade laws of the countries we import to and provide information as precise and accurate as possible for customs purposes, including product safety and certifications. We respect the laws about restricted transactions in and with sanctioned countries.

### **Product Responsibility**

We seek to ensure the highest quality and safety of our materials provided and of our services. Based on our distribution business we are not directly involved in material manufacturing and, therefore, rely on our manufacturing partner's thorough quality control. Nevertheless, we have installed thorough quality check and qualification processes as well as regular supplier assessment procedures with respect to quality and environmental aspects in all business operations controllable by us. Our standardized claim

management processes ensure professional, fast and clean management of customer feedback, complaints and claims.

### **Competition**

We believe in free and fair competition, and we support it. Irrespective of the market, we strictly fulfill the applicable competition laws. By principle we do not propose or enter into agreements that undermine a free and fair marketplace. In our organization we strictly prohibit agreements and understandings with competitors, such as cartels or bid rigging, that undermine these principles. Plastrans' members will never propose or enter into agreements, express or implied, formal or informal, written or oral with competitors. Specifically, but not limited to, we will not communicate about prices, pricing methods, price ranges, sales capacity and volumes, market share, terms and conditions of sale, credit terms, cost, profits and margins.

### **Conflicts of Interest & Bribery**

Consequently, we are against any form of bribery or taking personal advantage from conflicts of interest. Within the term "conflicts of interest" not only personal involvement and financial interest is covered, but also potential involvement and financial interest of relatives. All business and financial involvements with competitors, suppliers and customers are within the scope of conflicts of interest. The same applies if a Plastrans member is involved in the above-mentioned context via a second job. Additional employment and positions must not interfere with Plastrans' business activities. All Plastrans members must report any potential conflict of interest as soon as it becomes evident.

### **Exchanging Gifts and Entertainment**

While in many countries and business occasions exchanging gifts is part of conducting business, Plastrans' members are always aware that exchanging gifts is only permitted in appropriate amounts and values. Any exchange of gifts that could potentially create obligations or making the appearance of accepting bribe, especially but not exclusively, during a sales or purchase activity can severely harm Plastrans' business and are, therefore, prohibited and all attempts of bribery or influences on decision making must immediately be reported to the superior and management. This also extends to our Plastrans member's relatives. It goes without saying that Plastrans appreciates and fully follows the anti-corruption and anti-bribery legislation in our countries of operation.

### **Money Laundering**

Plastrans Technologies complies fully with all anti-money laundering and anti-terrorism laws. All our business partners are required to be reputable and perform legitimate business activities employing funds from legitimate sources. Business transactions with any organization being influenced or compromised by organized crime or terrorism are strictly prohibited within Plastrans and for all our members. Every new business partner is subject to a due diligence check for risk assessment, taking reasonable steps to prevent unacceptable and suspicious forms of payment. Any suspicious activity is immediately reported to the management and the required and appropriate steps will be taken.

### **Social- and Political Activities**

Plastrans Technologies is very cautious about being perceived as untransparent and unlawful. This is why we strongly recommend our members not to accept, specifically, political offices. In addition to potential interference with work performance, members in political positions bear the risk of creating an appearance that Plastrans influences political decision making directly.

Nevertheless, social engagement is much supported, and we like to encourage our team members to positively engage in their social communities, keeping in mind that these activities should be purely personal and not on behalf of our company unless with specific permission.

## **Asset and Data Management**

### **Confidential Information**

Within our business activity information, trade secrets and confidentiality are among the key assets for us. Keeping confidential information secret is a cornerstone for us to be a trustworthy and credible business partner. Confidential information describes all information, specifically marked or not, that contains proprietary information regarding intellectual property, patents, trade secrets, trademarks and copyrights, business plans, engineering and manufacturing ideas, designs, databases and records. Moreover, confidential information includes business strategies, transactions, pending contracts, new products or financial data. Generally, all kind of information that has the potential to harm us or our business partners if released to public will be kept strictly confidential by our Plastrans team members unless there is a legal or ethical obligation to share that kind of information. It goes without saying that no confidential information is discussed in unsecure places.

Moreover, the information gained must not and will not be used to achieve personal gain by one or several Plastrans team members.

### **Data Privacy**

At Plastrans we are very aware of the importance of data privacy for our business partner. Therefore, we strongly adhere to the European General Data Protection Regulation, which is one of the strictest regulations in data privacy. The Plastrans team uses personal and company information exclusively for the intended business purposes. Contact data will not be shared without written permission of the respective business partner. Data that is not strictly required for business purposes will not be saved on purpose. To keep the collected data safe within our IT system, we introduced suitable guidelines to prevent attacks on our systems and identify potential risks and targeted attacks early and eliminate them.

In case of any required or forced immediate shutdown of our system we have safety measures in place to prevent any data loss.

### **Public Appearance and Social Media**

Particularly in the plastics industry, public opinion and profound communication is very important. This is especially true as soon as business partners are concerned or mentioned in the communication. At Plastrans only specific members are authorized to publicly communicate on behalf of Plastrans

Technologies. We ask our team members representing Plastrans Technologies in public to dress and behave appropriately to support our message and business philosophy. We ask our team members, who are not authorized to speak in public on behalf of Plastrans to forward relevant inquiries to our management or marketing to be able to react in a precise, considerate and timely manner.

## **Securing Compliance at Plastrans**

Compliance with law, regulations and Plastrans ethics is the foundation of our work within Plastrans and also with our business partners and authorities. We are promoting our business conduct via providing our team members with thorough information about the key aspects of our code of conduct while onboarding and on a regular basis via specific training. We act proactively to adapt, modify and expand our compliancy program as required by our members and our business activities. We encourage our team to raise good faith concerns about compliance, internal policies and fulfillment of legal requirements so that we continuously improve, adapt and strengthen the resilience of our Plastrans team. It goes without saying that all raised concerns will be evaluated and addressed as appropriate by a premium that is appropriate to the matter of the raised concern.

## **Plastrans' Code Cornerstones**

The Code of Conduct of Plastrans Technologies GmbH relies on five basic principles and concepts:

- Equality, equal treatment and respectfulness
- No discrimination, promotion of diversity and open culture
- Support of our young talents and students in their endeavors in having their first career steps and providing them with advanced training opportunities
- Compliance to our values and encouragement to critically raise concerns without fear of retaliation
- Integrity and fairness in our work with business partners

## **Applicability of Code of Conduct an Ethics**

The Plastrans Technologies Code of Conduct is applicable to all Plastrans members irrespective of their working locations. This document is not intended as a final document and is subject to updates and refinements. This document cannot always claim completeness with respect to every law and regulation that is in force or is going to be enforced.

This Code of Conduct should be viewed as a Company policy. Therefore, compliance with the Code of Conduct and the ethics code herein can be considered as a pre-requisite for employment at Plastrans Technologies GmbH. Violations of this Code of Conduct might lead to disciplinary measures including, in extreme cases, a termination of employment.